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6 Attorneys for Defendants
SAN BERNARDINO COUNTY,
7 RAMAN SINGH, WILLIAM ZIEMER,
ROBERT ANDERSON,
8 EFRAIN HERRERA, and MELISSA
KRAMER
9

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 KAREN SHOVEY,
14 Plaintiff,

15 v.

16 SAN BERNARDINO COUNTY, RAMAN
SINGH, WILLIAM ZIEMER, ROBERT
17 ANDERSON, EFRAIN HERRERA,
MELISSA KRAMER and DOES 1-10,
18 inclusive,

19 Defendants.
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Case No.: 5:18-cv-02142-JGB-SHK
Judge: Jesus G. Bernal
Mag. Judge: Shashi H. Kewalramani

**STIPULATION FOR VOLUNTARY
DISMISSAL WITH PREJUDICE OF
PLAINTIFF KAREN SHOVEY'S
SECOND AMENDED COMPLAINT
AND ENTIRE ACTION AND ALL
CLAIMS**

[Filed Concurrently with [Proposed]
Order]

1 TO THE HONORABLE JUDGE JESUS G. BERNAL, UNITED STATES
2 DISTRICT COURT JUDGE PRESIDING:

3 IT IS HEREBY STIPULATED by and between the parties pursuant to Federal
4 Rule of Civil Procedure 41, that Plaintiff KAREN SHOVEY hereby dismisses with
5 prejudice her Second Amended Complaint (the operative complaint) and this entire
6 action and all claims against defendants SAN BERNARDINO COUNTY (and all of its
7 employees), RAMAN SINGH, WILLIAM ZIEMER, ROBERT ANDERSON, EFRAIN
8 HERRERA, and MELISSA KRAMER.

9 IT IS HEREBY STIPULATED that Plaintiff KAREN SHOVEY and her attorney
10 of record, Peter Schlueter and Schlueter Law Firm, PC, shall bear their own attorney's
11 fees and costs, including without limitation attorney's fees pursuant to 42 U.S.C. § 1988,
12 and defendants SAN BERNARDINO COUNTY, RAMAN SINGH, WILLIAM
13 ZIEMER, ROBERT ANDERSON, EFRAIN HERRERA, and MELISSA KRAMER, and
14 their attorney of record, John M. Fujii and Silver & Wright LLP, shall bear their
15 attorney's fees and costs.

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1 IT IS FURTHER STIPULATED that Plaintiff KAREN SHOVEY agrees to waive
2 and forego any rights to appeal with respect to any issues, rulings, or orders in this action.

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4 SO STIPULATED.

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6 Dated: 08-14, 2020

SILVER & WRIGHT LLP

7
8 By: 

JOHN M. FUJII
ADRIANNA C. PAIGE
Attorneys for Defendants
SAN BERNARDINO COUNTY,
RAMAN SINGH, WILLIAM
ZIEMER, ROBERT ANDERSON,
EFRAIN HERRERA, and MELISSA
KRAMER

9
10
11
12 Dated: 8-14, 2020

SCHLUETER LAW FIRM, PC

13
14
15 By: 

PETER SCHLUETER
Attorneys for Plaintiff
KAREN SHOVEY

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SAN BERNARDINO COUNTY,
7 RAMAN SINGH, WILLIAM ZIEMER,
ROBERT ANDERSON,
8 EFRAIN HERRERA, and MELISSA
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12
13 KAREN SHOVEY,
14 Plaintiff,

15 v.

16 SAN BERNARDINO COUNTY, RAMAN
SINGH, WILLIAM ZIEMER, ROBERT
17 ANDERSON, EFRAIN HERRERA,
MELISSA KRAMER and DOES 1-10,
18 inclusive,
19 Defendants.

Case No.: 5:18-cv-02142-JGB-SHK
Judge: Jesus G. Bernal
Mag. Judge: Shashi H. Kewalramani

**[PROPOSED] ORDER ON
STIPULATION FOR VOLUNTARY
DISMISSAL WITH PREJUDICE OF
PLAINTIFF KAREN SHOVEY'S
SECOND AMENDED COMPLAINT
AND ENTIRE ACTION AND ALL
CLAIMS**

1 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED by and between the
2 parties, pursuant to Federal Rule of Civil Procedure 41, that Plaintiff KAREN SHOVEY
3 dismisses with prejudice her Second Amended Complaint (the operative complaint) and
4 this entire action and all claims against defendants SAN BERNARDINO COUNTY (and
5 all of its employees), RAMAN SINGH, WILLIAM ZIEMER, ROBERT ANDERSON,
6 EFRAIN HERRERA, and MELISSA KRAMER.

7 IT IS FURTHER ORDERED that Plaintiff KAREN SHOVEY and her attorney of
8 record, Peter Schlueter and Schlueter Law Firm, PC, shall bear their own attorney's fees
9 and costs, including without limitation attorney's fees pursuant to 42 U.S.C. § 1988, and
10 defendants SAN BERNARDINO COUNTY, RAMAN SINGH, WILLIAM ZIEMER,
11 ROBERT ANDERSON, EFRAIN HERRERA, and MELISSA KRAMER, and their
12 attorney of record, John M. Fujii and Silver & Wright LLP, shall bear their attorney's
13 fees and costs.

14 IT IS FURTHER ORDERED that Plaintiff KAREN SHOVEY agrees to waive and
15 forego any rights to appeal with respect to any issues, rulings, or orders in this action.

16
17 IT IS SO ORDERED.

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19
20 Dated: _____

21 HON. JUDGE JESUS G. BERNAL
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